



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Brian Svoboda, Partner  
Perkins Coie LLP  
700 Thirteenth Street, N.W. Suite 600  
Washington, DC 20005-3960

SEP 07 2016

Re: MUR 7043  
Put Alaska First

Dear Mr. Svoboda:

On August 24, 2016, the Federal Election Commission accepted the signed conciliation agreement you submitted on behalf of Put Alaska First and Jim Lottsfeldt in his official capacity as treasurer, in settlement of a violation of 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a), provisions of the Federal Election Campaign Act of 1971, as amended, and the Commission's regulations. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

  
Kamau Philbert  
Attorney

Enclosure  
Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

Put Alaska First  
and Jim Lottsfeldt in his  
official capacity as treasurer

MUR 7043

**CONCILIATION AGREEMENT**

This matter was initiated pursuant to information ascertained by the Federal Election Commission (the "Commission") in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Put Alaska First and Jim Lottsfeldt in his official capacity as treasurer ("Respondent" or the "Committee") violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a).

NOW; THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  1. The Committee is an independent expenditure-only committee that registered with the Commission. Jim Lottsfeldt is the Committee's treasurer of record. Jim Lottsfeldt is a Respondent solely in his official capacity.

2. The Federal Election Campaign Act of 1971, as amended (the "Act") requires committee treasurers to file reports of receipts and disbursements in accordance with the provisions of 52 U.S.C. § 30104. *See* 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a). These reports must include, *inter alia*, the total amount of receipts, including the appropriate itemizations, where required. *See* 52 U.S.C. § 30104(b); 11 C.F.R. § 104.3(a).

3. On August 8, 2014, the Committee filed its original 2014 12-Day Pre-Primary Report covering the period from July 1, 2014, through July 30, 2014, which disclosed \$667,500 in receipts. On January 26, 2015, the Committee filed an Amended 2014 12-Day Pre-Primary Report that disclosed \$1,107,500 in receipts, an increase of \$440,000.

4. Respondent contends that it identified the increase in receipts through later reconciliation, and that it prepared and filed the amended report on its own initiative.

V. Respondent violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) by failing to accurately disclose receipts on its original 2014 12-Day Pre-Primary Report.

VI. 1. Respondent will pay a civil penalty to the Commission in the amount of Seven Thousand Seven Hundred Dollars (\$7,700) pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondent will cease and desist from committing violations of 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Daniel A. Petalas  
Acting General Counsel

BY:

Kathleen Guith  
Kathleen Guith  
Acting Associate General Counsel  
for Enforcement

9-6-16  
Date

FOR THE RESPONDENT:

Brian G. Svoboda  
Brian G. Svoboda  
Counsel to Respondent

Aug. 2, 2016  
Date